

■ STEAK BUFFET, INC.

10615

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAQ0301 GAO, L | | | | 4.350 HB | 03/05/12 | 010615 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 391.50 | FICA | 3.29 | 16.45 |
| Tips Reported | .00 | 200.00 | 1,000.00 | Medicare | 4.04 | 20.20 |
| | | | | FICA Tips | 8.40 | 42.00 |
| | | | | Tips Reported | 200.00 | 1,000.00 |
| GROSS EARNINGS: | | 278.30 | 1,391.50 | TOTAL DEDUCT: | 215.73 | 1,078.65 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

■ **STEAK BUFFET, INC.**

10629

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 03/19/12 | 010629 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 469.80 | FICA | 3.29 | 19.74 |
| Tips Reported | .00 | 200.00 | 1,200.00 | Medicare | 4.04 | 24.24 |
| | | | | FICA Tips | 8.40 | 50.40 |
| | | | | Tips Reported | 200.00 | 1,200.00 |
| GROSS EARNINGS: | | 278.30 | 1,669.80 | TOTAL DEDUCT: | 215.73 | 1,294.38 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

■ STEAK BUFFET, INC.

10642

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 04/02/12 | 010642 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 548.10 | FICA | 3.29 | 23.03 |
| Tips Reported | .00 | 200.00 | 1,400.00 | Medicare | 4.04 | 28.28 |
| | | | | FICA Tips | 8.40 | 58.80 |
| | | | | Tips Reported | 200.00 | 1,400.00 |
| GROSS EARNINGS: | | 278.30 | 1,948.10 | TOTAL DEDUCT: | 215.73 | 1,510.11 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

DEF 01047

■ **STEAK BUFFET, INC.**

10655

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 04/16/12 | 010655 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 626.40 | FICA | 3.29 | 26.32 |
| Tips Reported | .00 | 200.00 | 1,600.00 | Medicare | 4.04 | 32.32 |
| | | | | FICA Tips | 8.40 | 67.20 |
| | | | | Tips Reported | 200.00 | 1,600.00 |
| GROSS EARNINGS: | | 278.30 | 2,226.40 | TOTAL DEDUCT: | 215.73 | 1,725.84 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

■ STEAK BUFFET, INC.

10669

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 04/30/12 | 010669 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 704.70 | FICA | 3.29 | 29.61 |
| Tips Reported | .00 | 200.00 | 1,800.00 | Medicare | 4.04 | 36.36 |
| | | | | FICA Tips | 8.40 | 75.60 |
| | | | | Tips Reported | 200.00 | 1,800.00 |
| GROSS EARNINGS: | | 278.30 | 2,504.70 | TOTAL DEDUCT: | 215.73 | 1,941.57 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

DEF 01074

■ STEAK BUFFET, INC.

10681

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 05/14/12 | 010681 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 783.00 | FICA | 3.29 | 32.90 |
| Tips Reported | .00 | 200.00 | 2,000.00 | Medicare | 4.04 | 40.40 |
| | | | | FICA Tips | 8.40 | 84.00 |
| | | | | Tips Reported | 200.00 | 2,000.00 |
| GROSS EARNINGS: | | 278.30 | 2,783.00 | TOTAL DEDUCT: | 215.73 | 2,157.30 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

■ **STEAK BUFFET, INC.**

10693

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 05/28/12 | 010693 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 861.30 | FICA | 3.29 | 36.19 |
| Tips Reported | .00 | 200.00 | 2,200.00 | Medicare | 4.04 | 44.44 |
| | | | | FICA Tips | 8.40 | 92.40 |
| | | | | Tips Reported | 200.00 | 2,200.00 |
| GROSS EARNINGS: | | 278.30 | 3,061.30 | TOTAL DEDUCT: | 215.73 | 2,373.03 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

DEF 01099

■ STEAK BUFFET, INC.

10705

| EMPLOYEE | | SOCIAL SECURITY NO. | | PAY RATE | PERIOD END. | CHECK NO. |
|-----------------|-------|---------------------|----------|---------------|-------------|-----------|
| GAO0301 GAO, L | | | | 4.350 HB | 06/11/12 | 010705 |
| EARNINGS | HOURS | AMOUNT | YTD | DEDUCTION | AMOUNT | YTD |
| Regular | 18.00 | 78.30 | 939.60 | FICA | 3.29 | 39.48 |
| Tips Reported | .00 | 200.00 | 2,400.00 | Medicare | 4.04 | 48.48 |
| | | | | FICA Tips | 8.40 | 100.80 |
| | | | | Tips Reported | 200.00 | 2,400.00 |
| GROSS EARNINGS: | | 278.30 | 3,339.60 | TOTAL DEDUCT: | 215.73 | 2,588.76 |
| NET EARNINGS: | | 62.57 | | | | |

PRODUCT DLB333

USE WITH 91500 ENVELOPE

Deluxe For Business 1-800-225-6380 or www.nebs.com

King Buffet

| 2013 | Month | January | February | March | April | May | June | July | August | September | October | November | December |
|------|-------------------------|---------|----------|---------|---------|---------|---------|---------|---------|-----------|----------|----------|----------|
| | # of Servers | 111=3 | 11=2 | 111=3 | 111=3 | 111=3 | 111=3 | 111=3 | 111=3 | 111=3 | 111=3 | 111=3 | 111=3 |
| | # of Kitchen | 11111=5 | 11111=5 | 11111=5 | 11111=5 | 11111=5 | 11111=5 | 11111=5 | 11111=5 | 111111=6 | 111111=6 | 111111=6 | 111111=6 |
| | # of Kitchen Aid/Server | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |

| 2014 | Month | January | February | March | April | May | June | July | August | September | October | November | December |
|------|-------------------------|----------|----------|----------|-------|-----|------|------|--------|-----------|---------|----------|----------|
| | # of Servers | 111=3 | 111=3 | 111=3 | | | | | | | | | |
| | # of Kitchen | 111111=6 | 111111=6 | 111111=6 | | | | | | | | | |
| | # of Kitchen Aid/Server | 1 | 1 | 1 | | | | | | | | | |

2012:

| | Jan | Feb | March | April | May | June | July | Aug | Sept | Oct | Nov | Dec |
|---------|-----------------|-----------------|-------|-------|-----|------|------|-----|------|-----|-----|-----|
| Servers | | | | | | | | | | | | |
| Kitchen | | | | | | | | | | | | |

2013

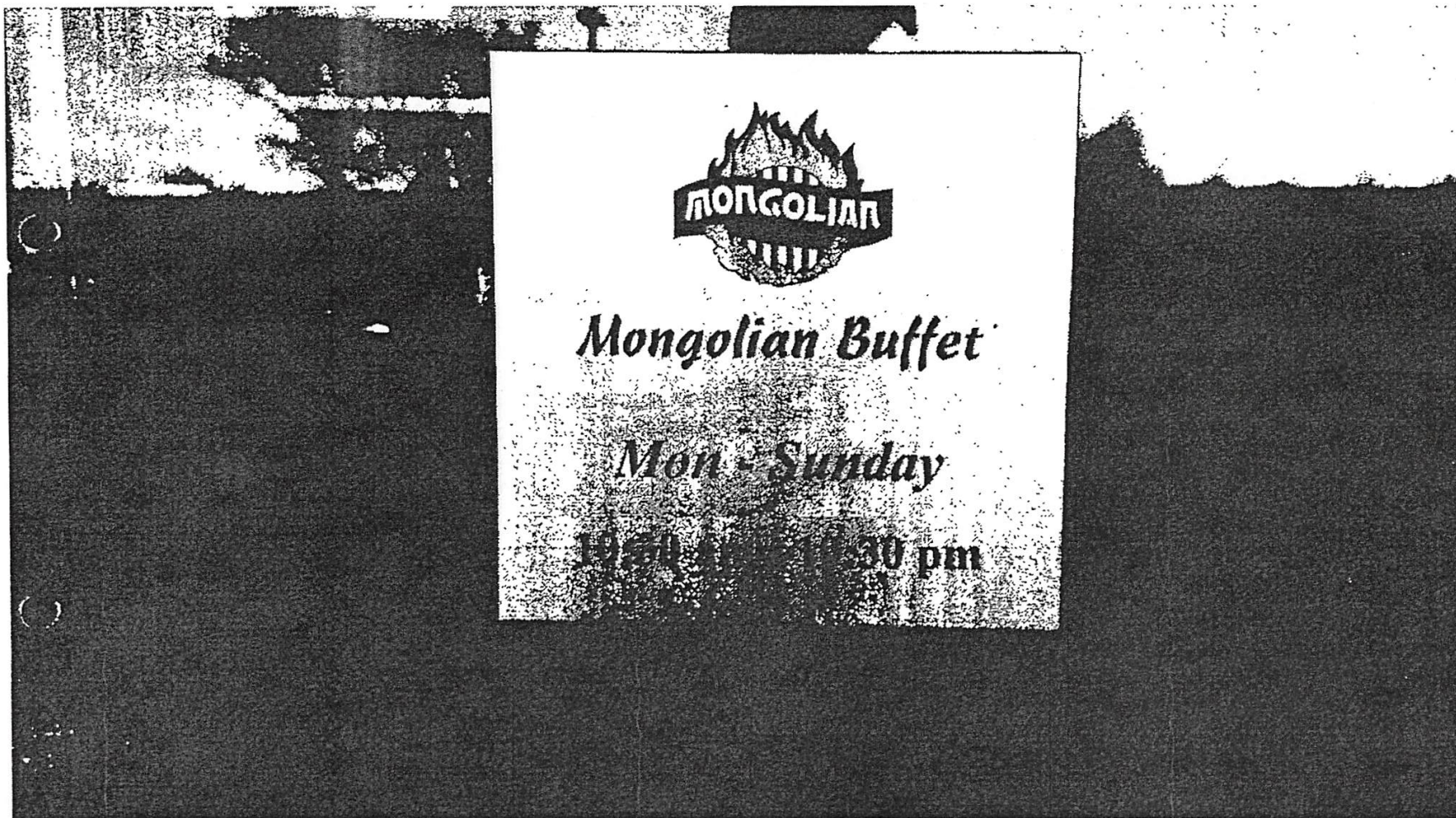
| | Jan | Feb | March | April | May | June | July | Aug | Sept | Oct | Nov | Dec |
|---------|-----|-----|-------|-------|-----|------|------|-----|------|-----|-----|-----|
| Servers | | | | | | | | | | | | |
| Kitchen | | | | | | | | | | | | |

2014:

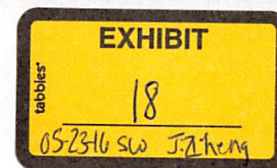
| | Jan | Feb | March | April | May | June | July | Aug | Sept | Oct | Nov | Dec |
|---------|-----|-----|-------|-------|-----|------|------|-----|------|-----|-----|-----|
| Servers | | | | | | | | | | | | |
| Kitchen | | | | | | | | | | | | |

DOL00869

0-64



DOL00931



SEC. APP'X 834



Mongolian Buffet

Mon - Sunday

10:30 am - 10:30 pm

KPF/TEM



Kelsey J. Knowles
Direct Dial: (515) 283-4631
Direct Fax: (515) 558-0631
E-mail: kjknowles@belinmccormick.com

REC'D KOSOL 13/JUN/16 PM 2:11

June 8, 2016

Traci Martin
United States Department of Labor
Office of the Solicitor
Two Pershing Square Building
2300 Main Street, Suite 1020
Kansas City, MO 64108

Re: *U.S. Dep't of Labor v. Li, et al.*, USDC Case No. 15-136

Dear Traci:

Enclosed please find a supplemental production from Defendants in this matter. I do not believe any of the enclosed documents are directly responsive to a Request for Production of Documents but, because we may rely on the enclosed documents going forward, we wanted to produce them now.

Sincerely,

A handwritten signature in black ink that reads "Kelsey J. Knowles".

Kelsey J. Knowles
For the Firm

KJK/so

Enclosures

M1614/0001(02423384)

DECLARATION OF CARLA REYNOLDS

1. I, Carla Reynold, am, and at all times material hereto, have been the Docket Clerk for the Office of the Solicitor, United States Department of Labor, located in Kansas City, Missouri.

2. As part of my job duties, I open the office's mail and stamp it to record the date and time received.

3. On June 13, 2016, our office received a packet of documents from Kelsey Knowles, opposing counsel in a case currently being litigated in our office. I stamped the cover letter with the date and time it was received: June 13, 2016, at 2:11 p.m. A true and correct copy of this letter is part of the Appendix to the Secretary's Motion in Opposition to Summary Judgment, at page 836.

4. I certify under penalty of perjury and pursuant to the laws of the state of Missouri that the preceding is true and correct.

Executed on this 25th day of July, 2015.


Carla Reynolds

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA**

THOMAS E. PEREZ,)
SECRETARY OF LABOR,)
U.S. DEPARTMENT OF LABOR,)

Plaintiff,)

v.)

Case No. 4:15-cv-00136-RP-HCA

LI YING LI and JIAN YUN ZHENG,)
individually; KING BUFFET OF IA, INC.,)
d/b/a KING BUFFET;)
KING BUFFET OF AMES, INC.;)
BUFFET MONGOLIAN GRILL, INC.,)
d/b/a MONGOLIAN BUFFET; and)
STEAK BUFFET, INC.,)

Defendants.)

**PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANTS KING BUFFET OF IA, INC., d/b/a KING BUFFET,
AND KING BUFFET OF AMES, INC.**

Plaintiff, pursuant to Federal Rule of Civil Procedure 34, requests Defendants King Buffet of IA, Inc., d/b/a King Buffet, and King Buffet of Ames, Inc. (hereinafter referred to collectively as “King Buffet” or “the restaurant”), through their duly authorized representative, to file a written response to each of the following requests within thirty (30) days of service and to produce or permit the copying of the following documents at the Office of the Regional Solicitor, Suite 1020, Two Pershing Square, 2300 Main, Kansas City, Missouri 64108 within thirty (30) days of this request. Unless otherwise specified, all requests refer to the period from March 5, 2012 to the date of response.

REQUEST NO. 1: To the extent not already provided, all payroll records reflecting, for each pay period, the number of weekly hours worked and rates and amounts of pay for each employee listed in Appendix A of the Complaint in this matter, including but not limited to timecards and paystubs.

RESPONSE:

REQUEST NO. 2: Any and all written messages, notes, memoranda, handbooks or other documents that set forth King Buffet's policy regarding overtime pay.

RESPONSE:

REQUEST NO. 3: Any and all written messages, notes, memoranda, handbooks or other documents that set forth King Buffet's policy regarding employee breaks and/or whether employees were allowed to stay in the restaurant and work during their breaks.

RESPONSE:

REQUEST NO. 4: Any and all written messages, notes, memoranda, handbooks or other documents that set forth King Buffet's policy regarding the recording of tips and tip pooling.

RESPONSE:

REQUEST NO. 5: Any and all training materials, written messages, notes, memoranda, handbooks, agreements or other documents used to ensure King Buffet employees were trained on and understood the restaurant's timekeeping methods.

RESPONSE:

REQUEST NO. 6: Any and all written messages, notes, memoranda, handbooks, agreements or other documents by which employees of King Buffet were informed concerning the basis of their compensation.

RESPONSE:

REQUEST NO. 7: Any and all written messages, notes, memoranda, handbooks or other documents that set forth the scheduled shifts or required work hours for any of the employees listed in Appendix A of the Complaint in this matter.

RESPONSE:

REQUEST NO. 8: Written job descriptions for all employees listed in Appendix A of the Complaint in this matter.

RESPONSE:

REQUEST NO. 9: Any documents, including but not limited to job postings, employment contracts, or internal memos, describing job duties for all employees listed in Appendix A of the Complaint in this matter.

RESPONSE:

REQUEST NO. 10: Any documents, including but not limited to job postings, advertisements, or contracts and/or communications with third-party employment/staffing agencies, showing King Buffet's efforts to recruit new employees.

RESPONSE:

REQUEST NO. 11: Any and all communications between King Buffet and Tricity Accounting Services Inc. following the Department of Labor Wage and Hour Division's 2002 and 2005 investigations of the restaurant concerning compliance with the Fair Labor Standards Act.

RESPONSE:

REQUEST NO. 12: Any and all communications between King Buffet and Tricity Accounting Services Inc. concerning the processing of the restaurant's payroll.

RESPONSE:

REQUEST NO. 13: Any and all communications between King Buffet and Ya Sing concerning compliance with the Fair Labor Standards Act.

RESPONSE:

REQUEST NO. 14: All federal and state tax forms, including but not limited to income and payroll, filed by or in connection with the firm for the years 2012, 2013, 2014, and 2015.

RESPONSE:

REQUEST NO. 15: All documents identified by Defendants in their answers to the Plaintiff's Interrogatories or relied upon by Defendants in responding to said Interrogatories.

RESPONSE:

M. Patricia Smith
Solicitor of Labor

Christine Z. Heri
Regional Solicitor

H. Alice Jacks
Associate Regional Solicitor

/s/Traci E. Martin
Traci Martin
Attorney
2300 Main Street, Suite 1020
Kansas City, MO 64108
(816) 285-7272
(816) 285-7287 (fax)
martin.traci.e@dol.gov

*Attorneys for Secretary of Labor
U.S. Department of Labor*

CERTIFICATE OF SERVICE

I hereby certify that an original of the foregoing Plaintiff's First Request for Production to Defendants King Buffet of IA, Inc., d/b/a King Buffet, and King Buffet of Ames, Inc. was sent by electronic mail this 2nd day of November, 2015 to:

Kelsey J. Knowles
Belin McCormick, P.C.
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309-3989
KJKnowles@belinmccormick.com

/s/Traci E. Martin

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA**

THOMAS E. PEREZ,
SECRETARY OF LABOR,
U.S. DEPARTMENT OF LABOR,

Plaintiff,

v.

LI YING LI and JIAN YUN ZHENG,
individually; KING BUFFET OF IA, INC.,
d/b/a KING BUFFET;
KING BUFFET OF AMES, INC.;
BUFFET MONGOLIAN GRILL, INC.,
d/b/a MONGOLIAN BUFFET; and
STEAK BUFFET, INC.,

Defendants.

Case No. 4:15-cv-00136-RP-HCA

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANTS BUFFET MONGOLIAN GRILL, INC.,
d/b/a MONGOLIAN BUFFET, AND STEAK BUFFET, INC.**

Plaintiff, pursuant to Federal Rule of Civil Procedure 34, requests Defendants Buffet Mongolian Grill, Inc., d/b/a Mongolian Buffet, and Steak Buffet, Inc. (hereinafter referred to collectively as "Mongolian Buffet" or "the restaurant") through their duly authorized representative, to file a written response to each of the following requests within thirty (30) days of service and to produce or permit the copying of the following documents at the Office of the Regional Solicitor, Suite 1020, Two Pershing Square, 2300 Main, Kansas City, Missouri 64108 within thirty (30) days of this request. Unless otherwise specified, all requests refer to the period from March 5, 2012 to the date of response.

5JAD3013TEM

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RESPONSE:

REQUEST NO. 3: Any and all written messages, notes, memoranda, handbooks or other documents that set forth Mongolian Buffet's policy regarding employee breaks and/or whether employees were allowed to stay in the restaurant and work during their breaks.

RESPONSE:

REQUEST NO. 4: Any and all written messages, notes, memoranda, handbooks or other documents that set forth Mongolian Buffet's policy regarding the recording of tips and tip pooling.

RESPONSE:

REQUEST NO. 5: Any and all training materials, written messages, notes, memoranda, handbooks, agreements or other documents used to ensure Mongolian Buffet employees were trained on and understood the restaurant's timekeeping methods.

RESPONSE:

REQUEST NO. 6: Any and all written messages, notes, memoranda, handbooks, agreements or other documents by which employees of Mongolian Buffet were informed concerning the basis of their compensation.

RESPONSE:

REQUEST NO. 7: Any and all written messages, notes, memoranda, handbooks or other documents that set forth the scheduled shifts or required work hours for any of the employees listed in Appendix A of the Complaint in this matter.

RESPONSE:

REQUEST NO. 8: Written job descriptions for all employees listed in Appendix A of the Complaint in this matter.

RESPONSE:

REQUEST NO. 9: Any documents, including but not limited to job postings, employment contracts, or internal memos, describing job duties for all employees listed in Appendix A of the Complaint in this matter.

RESPONSE:

REQUEST NO. 10: Any documents, including but not limited to job postings, advertisements, or contracts and/or communications with third-party employment/staffing agencies, showing Mongolian Buffet's efforts to recruit new employees.

RESPONSE:

REQUEST NO. 11: Any and all communications between Mongolian Buffet and Tricity Accounting Services Inc. concerning the processing of the restaurant's payroll.

RESPONSE:

REQUEST NO. 12: Any and all communications between Mongolian Buffet and Ya Sing concerning compliance with the Fair Labor Standards Act.

RESPONSE:

REQUEST NO. 13: All federal and state tax forms, including but not limited to income and payroll, filed by or in connection with the firm for the years 2012, 2013, 2014, and 2015.

RESPONSE:

REQUEST NO. 14: All documents identified by Defendants in their answers to the Plaintiff's Interrogatories or relied upon by Defendants in responding to said Interrogatories.

RESPONSE:

M. Patricia Smith
Solicitor of Labor

Christine Z. Heri
Regional Solicitor

H. Alice Jacks
Associate Regional Solicitor

/s/Traci E. Martin
Traci Martin
Attorney
2300 Main Street, Suite 1020
Kansas City, MO 64108
(816) 285-7272
(816) 285-7287 (fax)
martin.traci.e@dol.gov

*Attorneys for Secretary of Labor
U.S. Department of Labor*

CERTIFICATE OF SERVICE

I hereby certify that an original of the foregoing Plaintiff's First Request for Production to Defendants Buffet Mongolian Grill, Inc., d/b/a Mongolian Buffet, and Steak Buffet, Inc. was sent by electronic mail this 2nd day of November, 2015 to:

Kelsey J. Knowles
Belin McCormick, P.C.
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309-3989
KJKnowles@belinmccormick.com

/s/Traci E. Martin

DECLARATION

I, Shizhao Zheng, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME

郑时昭

Date

3-16-2016

DEF 01745

DECLARATION

I, Liang Fang Dong, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a Parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME 董芳芳

Date 3-17-2016

DEF 01740

DECLARATION

I, ZHAO SHUI LI, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a

parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME ZHAO SHUI LI

Date

DECLARATION

I, Xiuying Zhu, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME Xiuying Zhu

Date 3/17/16

DEF 01746

DECLARATION

I, Zeng Xing Li, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME Zeng Xing Li

Date 3/17/16

DEF 01742

DECLARATION

I, Aimee Li, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME Aimee Li

Date 3/19/16

DEF 01741

DECLARATION

I, Li Rong Chen under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King or Mongolian Buffet. I worked as a Parttime.

2. I did not work 6 days a week, 12 hours a day.

3. I was paid for all hours I worked. My paycheck accurately reflected the hours I worked. When I received cash tips, I kept my tips.

4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

NAME Li Rong Chen

Date 3/17/16

DEF 01747

DECLARATION OF XIAO QI CHEN

I, Xiao Qi Chen, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of King Buffet. During my time at King Buffet I worked as a server and in the kitchen.
2. I worked 3-4 days a week for a few hours each day. I did not work 6 days a week, 12 hours a day. I wrote down my time every day when I worked and signed my timesheet.
3. I was paid for all hours I worked. When I worked as a server I earned tips and I kept the tips I earned.
4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

Xiao Qi Chen
XIAO QI CHEN

7/22/2016
Date

DECLARATION OF JIRONG LI

I, Jirong Li, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of both King and Mongolian Buffet. During my time at King and Mongolian Buffet I rotated as a server and kitchen employee.
2. I worked part-time. I did not work 6 days a week, 12 hours a day. I wrote down my time every day when I worked and signed my timesheet.
3. I was paid by check for all hours I worked. I kept the tips I earned when I worked as a server.
4. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.

Jirong Li

Jirong Li

2/16/2016

Date

DECLARATION OF LAN LIN

I, Lan Lin, under pain and penalty of perjury, hereby declare as follows:

1. I am a former employee of both King Buffet and Mongolian Buffet. During my time at King Buffet and Mongolian Buffet I worked as a host and cashier.
2. I typically worked three or four days a week. Most shifts were six hours, either 10am to 4pm or 4pm to closing. On one occasion that I recall I worked six days in one week because Annie, one of the owners, was out of the country. Other than that occasion, I did not work 6 days a week. I did not work 12 hours a day. I wrote down my time every day when I worked and signed my timesheet.
3. I am not aware of any other employees who worked in the front of the restaurant who worked 12 hours a day. Employees were free to come and go in the middle of the day between lunch and dinner. I do not have any knowledge about kitchen employees.
4. I was paid by check for all the hours I worked. I did not earn tips.
5. I do not wish to sue my former employers. I do not believe I am owed wages and have no desire for the Department of Labor to sue on my behalf.

Further Declarant sayeth naught.



LAN LIN

2/22/2016

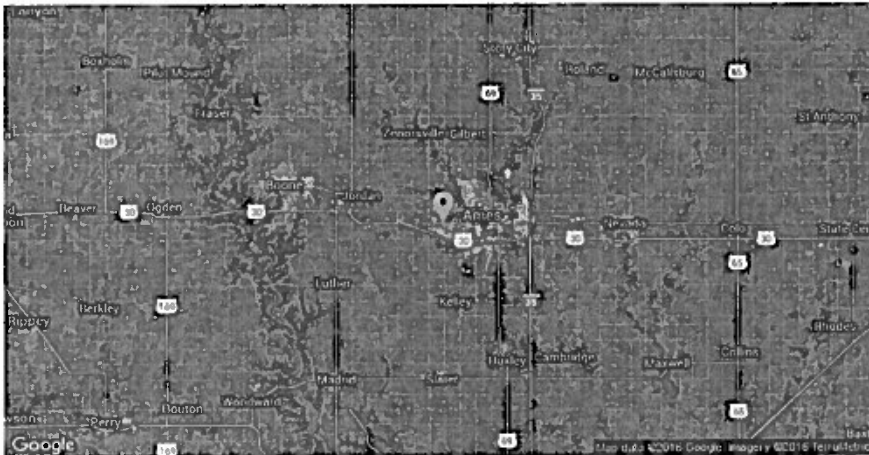
Date

PeopleMap Person Record
LIRONG CHEN

7/19/2016 10:21:49 AM
Client ID:1-1

LIRONG CHEN

4536 WEBSTER ST, AMES, IA 50014-7997 | STORY County



SSN:



DOB:

1956 (Age: 59)

Known Addresses:

4536 WEBSTER ST, AMES, IA 50014-7997 | STORY County

First Reported 03/06/2015 Last Reported 06/17/2015

By Experian Credit Header 03/06/2015 - 06/17/2015

PeopleMap Person Record
XIAOQI CHEN

7/19/2016 10:11:06 AM
Client ID:1-1

XIAOQI CHEN

1591 PARK AVE APT 2A, NEW YORK, NY 10029-1844 | NEW YORK County



SSN:



DOB:



1985 (Age: 31)

AKAs:

XIAO CHOA

XIAO Q CHEN

XIAO QI CHEN

Known Addresses:

1591 PARK AVE APT 2A, NEW YORK, NY 10029-1844 | NEW YORK County

First Reported 11/03/2015 Last Reported 11/07/2015

By Experian Credit Header 11/03/2015 - 11/07/2015

1591 PARK AVE APT 2G, NEW YORK, NY 10029-1844 | NEW YORK County

First Reported 10/27/2015 Last Reported 10/27/2015

By Experian Credit Header 10/27/2015

4536 WEBSTER ST. AMES, IA 50014-7997 | STORY County

First Reported 02/28/2015 Last Reported 08/21/2015

By Experian Credit Header 02/28/2015 - 08/21/2015

3409 HARCOURT DR. AMES, IA 50010-8422 | STORY County

First Reported 10/26/2014 Last Reported 10/26/2014

By Experian Credit Header 10/26/2014

PeopleMap Person Record
JIA RONG LI

7/19/2016 10:28:17 AM
Client ID:1-1

JIA RONG LI

13257 AVERY AVE, FLUSHING, NY 11355-4901 | QUEENS County



SSN:



DOB:

1989 (Age: 26)

Gender:

MALE

Height:

5'05"

Weight:

120

Drivers License #:



AKAs:

JIA LI

JIA RONG LI

JIA R LI

Known Addresses:

13257 AVERY AVE, FLUSHING, NY 11355-4901 | QUEENS County

First Reported 10/29/2015 Last Reported 11/06/2015

By Experian Credit Header 10/29/2015 - 11/06/2015

13257 AVERY I AVE, FULSHING, NY 11355

First Reported 10/30/2015 Last Reported 10/30/2015

By Experian Credit Header 10/30/2015

4536 WEBSTER ST, AMES, IA 50014-7997 | STORY County

PeopleMap Person Record
JIA RONG LI

7/19/2016 10:28:17 AM
Client ID: 1-1

First Reported 06/01/2012 Last Reported 06/15/2015
By Experian Credit Header 08/19/2012 - 06/15/2015
By Utility 06/01/2012 - 06/18/2012

3409 HARCOURT DR, AMES, IA 50010-8422 | STORY County
First Reported 04/16/2013 Last Reported 10/23/2014
By Experian Credit Header 04/16/2013 - 10/23/2014

1213 HARPETH DR, MEMPHIS, TN 38134-8033 | SHELBY County
First Reported 10/01/2012 Last Reported 02/07/2013
By Utility 01/01/2013 - 02/07/2013
By Driver License 01/17/2013
By Experian Credit Header 10/01/2012 - 12/01/2012

●●●●● AT&T

下午4:15

77%

< 信息

+1 (515) 783-9059

详细信息

2014年3月31日 上午9:16

Ying, please bring federal tax I'd # for
bu

For Buffet Mongolian Grill. I only have
the one for Steak Buffet. Thank you.
Maria

Ok, I will bring tomorrow

2014年3月31日 上午11:43

Can you also bring dates of birth for
employees under 19. What time are
you planning on coming.

By 11:00

Jessica around 09/30/2011 star
work

2014年4月1日 上午8:54

I need the dates of birth not the start
date.

Jessica birthday 05/11/1994

2014年4月1日 下午2:36



发送

●○○○○ AT&T

下午4:15

77%

◀ 信息

+1 (515) 783-9059

详细信息

Li, We have a couple of questions for your accountant. Is it ok to give them a call. Maria

Ok

2014年4月4日 上午8:51

Li, I need you to e-mail me the cash payments for all the employees of both Mongolian Buffet and King Buffet. Gonzalez.maria@dol.gov

I don't pay cash for employees, only one Mexican guy in Mongolian

In king buffet the three Mexican guy I all very give you

2014年4月15日 上午8:56

Li, what is the name of the employee at mongolian buffet who gets cash. Thanks, Maria.

Everything I all get for you

2014年4月15日 下午12:47

I can't tell which one it is on the list of



发送

●●●●● AT&T

下午4:15

77%

< 信息

+1 (515) 783-9059

详细信息

2014年5月8日 下午4:15

I can't tell which one it is on the list of employees you gave me. The names you gave me are on the payroll. I need the full name. Thanks.

No cash payment everything on the payroll

You told me in your last text that you had only one Mexican who got cash at Mongolian. Are you now saying that was incorrect?

He has on the payroll to

He got some checks and some cash

He name is Chavez Cruz Mauricio

What is his cash amount. Did he get both cash and check during the same pay period.

On 2013 he got cash \$22260.00

2014年5月8日 上午11:51

Hi marina ok we can meet at next Tuesday 8:30am



发送

●○○○○ AT&T

下午4:15

77%

< 信息

+1 (515) 783-9059

详细信息

He has on the payroll to

He got some checks and some cash

He name is Chavez Cruz Mauricio

What is his cash amount. Did he get both cash and check during the same pay period.

On 2013 he got cash \$22260.00

2014年5月8日 上午11:01

Hi marina ok we can meet at next Tuesday 8:30am

Meet where at your office or somewhere?

Meet your office on Tuesday at 8:30am

2014年5月8日 下午1:46

Confirming the meeting will be in my office at 8:30 am. See you than.

Ok I will at there on time



发送